

## Opposition to RM-11306

Wise engineers always work to the principle, “if it ain't broke, don't fix it”. It should be clear from the overwhelming negative response to the original Petition for Rule Making filed November 2005 and given the file number RM-11306 that the ARRL was proposing a fix to something that was not broken: the mode allocations within the amateur radio bands. I believed the numerous negative comments on the original petition have essentially ended its existence.

I am surprised and appalled to see that on February 13, 2007 the ARRL held an Oral Ex Parte Presentation with FCC staff to revive an amended RM-11306 and then filed a formal amendment on March 22, 2007. These latest moves by the ARRL, communicated to its membership only after the fact, demonstrate, once again an attempt to fix something that is not broken. Along with most of my colleagues who have commented on this latest move by ARRL, I most strongly oppose all changes proposed by the original and the amended petition.

In the last few months amateur radio has been impacted by two rule changes: the “no code” requirement and the reallocation of a number of HF bands. It is highly likely that these changes will significantly alter activity on the bands. It is much too soon to determine what the end state activity will be. It is imprudent and unwise to make more changes to a situation in flux with no evidence of what the final state will be. It is certainly not clear that the current state of amateur band allocation is “broke”. What is the ARRL attempting to “fix”?

Of particular and immediate concern are changes proposed in RM-11306 which many believe will have severe negative impact. Two potential disastrous consequences of the ARRL proposal stand out: the huge bandwidth increase for digital communications in previously narrow-band frequency ranges, and the proposed automatic control of digital stations outside the current sub-bands. I agree with those who have made negative comments on the proposal; adoption could create chaos. In my view the only changes adoption of any of the recommendations in RM-11306 would be negative. The ARRL has not given me any reason to believe that any good would occur.

I am a member of ARRL. I was never asked by that organization, which purports to represent my interests, for comment on any of the versions of RM-11306. It is obvious from recent comments to the FCC that many ARRL members, including myself, disagree with the position and proposal of the League. I have no idea why the League is pursuing this misguided petition. In addition to apparently not representing the wishes of many rank-and-file members, the ARRL petition clearly violates good engineering practice—it attempts to fix something that “ain't broke.”

I request that you please rule against the entire petition.

Respectfully,

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W7DAX - Extra Class